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### **UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA**

1           ANIBAL RODRIGUEZ, SAL CATALDO,  
 2           JULIAN SANTIAGO, and SUSAN LYNN  
 3           HARVEY individually and on behalf of all  
 4           other similarly situated,

5           Plaintiffs,

6           vs.

7           GOOGLE LLC,

8           Defendant.

9           Case No.: 3:20-cv-04688-RS

#### **DECLARATION OF RYAN SILA IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL EXHIBIT TO SUPPLEMENTAL AZARI DECLARATION**

10          Judge: Hon. Richard Seeborg  
 11          Courtroom 3 – 17th Floor

1                   **DECLARATION OF RYAN SILA**

2                 I, Ryan Sila, declare as follows.

3                 1.         I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs  
4                 in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New  
5                 York and admitted *pro hac vice* for this case. Dkt. 232. I have personal knowledge of the matters  
6                 set forth herein and am competent to testify.

7                 2.         Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs'  
8                 administrative motion to seal Exhibit 1 to the Supplemental Declaration of Cameron R. Azari  
9                 Regarding the Implementation and Adequacy of the Class Notice Plan and Notices. In making this  
10                 request, Plaintiffs have carefully considered the relevant legal standard and policy considerations  
11                 outlined in Civil Local Rule 79-5.

12                 3.         Plaintiffs respectfully request that the Court seal portions of Exhibit 1, which is  
13                 attached to the supplemental Azari declaration.

14                 4.         The information requested to be sealed reveals the names, email addresses, and  
15                 other information regarding individuals who submitted requests to be excluded from the certified  
16                 classes in this case.

17                 5.         If the Court were to deny sealing this information, these individuals could be  
18                 subjected to a heightened risk of injury, including identity theft.

19                 I declare under penalty of perjury under the laws of the United States of America that  
20                 the foregoing is true and correct. Executed this 2nd day of April, 2025, at New York, New York.

21                   /s/ Ryan Sila